

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

JAMES THOMPSON,
Plaintiff,

v.

RATIONALWIKI FOUNDATION, INC.
d/b/a RATIONALMEDIA FOUNDATION,
TRENT TOULOUSE, LARRY WILL and
JOHN DOE,
Defendants.

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No. 1:25-cv-350

JURY DEMANDED

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, JAMES THOMPSON, by and through undersigned Counsel, Aaron T. Cress, Esq. (LATE NIGHT LAW, LLC), and hereby respectfully complains and shows as follows.

PARTIES, JURISDICTION & VENUE

1. Plaintiff James Thompson, Ph.D. is a citizen of the United Kingdom.
2. Defendant RationalWiki Foundation, Inc. d/b/a RationalMedia Foundation, is a New Mexico domestic nonprofit corporation and 501(c)(3), EIN 27-3197280, with its principal place of business located in New Mexico, at 122 Girard Ave NE Albuquerque, NM 87106.
3. Defendant Trent Toulouse is a resident of Albuquerque, New Mexico and was at all times relevant an officer and a Board Trustee of Defendant RationalWiki Foundation, Inc.
4. Defendant Larry Will is a resident of Maryland and was at all times relevant a Board Trustee of Defendant RationalWiki Foundation, Inc., under the pseudonym “Cosmikdebris.”
5. Defendant John Doe was, at all times relevant, a moderator of a website published by Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon

reasonable investigation, and who uses the online pseudonym “Bongolian.” Upon information and belief, this individual is a United States citizen.

6. The Court has personal jurisdiction over the Defendants by virtue of their continuous and systematic business contacts with New Mexico, and because the Defendants’ acts and omissions alleged herein were committed in New Mexico.

7. Plaintiff invokes the Court’s subject matter jurisdiction pursuant to 28 U.S.C. § 1332, because the matter in controversy exceeds the sum or value of \$75,000, exclusive of costs and interest, and because no Defendant is a resident of the same state as the Plaintiff.

8. Venue is proper before the Court.

GENERAL ALLEGATIONS

I. RATIONALWIKI FOUNDATION, INC. IS AN INFORMATION CONTENT PROVIDER

9. Under 47 U.S.C. § 230, an “interactive computer service” is afforded certain protections from civil liability. However, Section 230 distinguishes between an “interactive computer service,” and an “information content provider,” which does not enjoy such protections.

10. Section 230 defines an “interactive computer service” as “any information service, system, or access software provider that provides or enables computer access by multiple users to a computer server...” 47 U.S.C. 230(f)(2).

11. Section 230 defines an “information content provider” as “any person or entity that is responsible, in whole or in part, for the creation or development of information provided through the internet or any other interactive computer service.” 47 U.S.C. 230(f)(3).

12. Defendant RationalWiki Foundation, Inc. (“RWF”) is an information content provider.

13. RWF publishes, maintains and operates a website, at <https://rationalwiki.org> (the website, hereinafter referred to as, “RationalWiki”).

14. RWF was incorporated in 2011 by Defendant Trent Toulouse, a resident of New Mexico.

15. Since 2011, Toulouse has served continuously as both a Board Trustee, and Operations Manager, of RWF.

16. The Operations Manager within RWF functions as an executive officer.

17. As Operations Manager, Toulouse has the sole ability to alter settings and create functions and extensions on the website server.

18. The website server is, and at all times relevant was, located in New Mexico.

19. The website server is, and at all times relevant was, operated from New Mexico.

20. Toulouse has operated and managed RationalWiki—the website—from New Mexico continuously, since at least 2011, until the present.

21. New Mexico is the principal geographic locus of RWF's and RationalWiki's operations.

22. RWF is governed by a Board of Trustees. Other than Toulouse, and an individual named David Gerard, all past and current Trustees use pseudonyms on RationalWiki.

23. Since 2011, only twenty-seven individuals have ever served as Trustees of RWF.

24. RationalWiki has over 8,000 discrete articles and millions of unique monthly visitors.

25. RationalWiki's "Community Standards" page was created by Defendant Toulouse, and has been edited by Defendants Will, and Doe, within the last three years.

26. The page states, *inter alia*, that: (i) RationalWiki articles should take a "snarky" (meaning, snide or derisive) tone; that (ii) RationalWiki has a "scientific point of view," meaning that "our articles take the side of the scientific consensus on an issue"; and that (iii) all content on RationalWiki must conform to the "RationalWiki Mission."

27. The "RationalWiki Mission" page, in turn, states, *inter alia*, that:

The RationalWiki Mission is:

1. Analyzing and refuting pseudoscience and the anti-science movement;
2. Documenting the full range of crank ideas;
3. Explorations of authoritarianism and fundamentalism.
4. Analysis and criticism of how these subjects are handled in the media.

We also have a fifth, unofficial purpose, which is to provide people who agree with the previously-stated goals a place to just hang out and have fun with like-minded people.

RationalWiki is not a general encyclopedia; it does not require articles on every known subject. However, the wiki's mainspace welcomes many articles that do not relate to the primary missions of RationalWiki providing that they are factually accurate and of interest to the community at large. These include articles on general science, historical events and important individuals throughout the world.

28. Various other policy pages on RationalWiki explicate and clarify this viewpoint further.

For example, each of the six underlined words in the above-quoted portion of the RationalWiki Mission denotes a hyperlink, which opens a separate page containing an article on that topic, i.e., on “pseudoscience,” “authoritarianism,” etc. These articles define what is meant by those terms as they are used in the RationalWiki Mission statement and throughout RationalWiki.

29. RationalWiki holds its content out as scientifically authoritative, and objective truth.

30. For example, a fundraiser banner that has appeared at the top of every page on RationalWiki since late 2024 reads, in part,

Fighting pseudoscience isn't free... We are... hundreds of volunteers who document pseudoscience and crankery around the world every day... [W]e believe we play an important role in defending truth and objectivity.

31. This banner links to a “Fundraiser” page that was created by Defendant Toulouse and has been edited by Defendant Doe, and within the last year by Defendant Will, and contains the same statements.

32. RationalWiki claims that anyone with access to the internet can “edit” (i.e., alter or contribute to the content of) the website, by authoring or editing the articles that appear there, in the nature of an interactive computer platform as defined under 47 U.S.C. § 230(f)(2).

33. This is not true in practice.

34. A very particular, highly ideologized, and readily identifiable left-liberal view of what is rational, what constitutes legitimate science, and what constitutes scientific consensus, pervades all of RationalWiki's articles, with virtually no variation.

35. Editors' contributions that contravene this viewpoint, or the RationalWiki Mission, are quickly removed from RationalWiki by a core of specialized editors, which includes Defendants Toulouse, Will, and Doe.

36. This core of specialized editors actively, regularly, and aggressively enforces RationalWiki's Mission and viewpoint. Articles that are not "on mission" are deleted or altered, edits that are not "on mission" are quickly reverted, and editors who do not uphold the Mission are blocked from contributing.

37. This core of specialized editors includes sysops, techs, and moderators. Most editors (including sysops, techs, and moderators) are anonymous, and use pseudonyms on the website.

38. Of these specialized editors, sysops are the lowest-ranking. There are approximately 1500 pseudonymous usernames listed as sysops on RationalWiki, though the true number of active individual sysops is lower than 200 individuals.

39. A page on RationalWiki titled, "Sysop guide" sets forth requirements that sysops must follow, including, "Checking edits by unknown contributors for untruth," and "to collaborate with others to further RationalWiki's mission." The underlined term denotes a hyperlink to the "RationalWiki Mission" page.

40. Techs, moderators, and sysops have authority to alter, block and censor content created by rank-and-file editors, in order to enforce the "Mission."

41. Techs and moderators have more extensive authority to block and censor than sysops and rank-and-file editors do.

42. Techs and moderators are the highest-ranking editors of RationalWiki. There are only fifteen techs, seven of whom, including Defendants Will and Toulouse, are current and/or past RWF Board Trustees. There are only six moderators, three of whom are current and/or past RWF Board Trustees. Defendant Doe is both a tech and a moderator.

43. Extensive canvassing of the articles on RationalWiki reveals that virtually all of the articles appearing there have been edited by one or more techs, one or more moderators, and one or more past or current Board Trustees; and that Defendants Toulouse, Will and Doe have each edited thousands of articles and ancillary pages, and regularly confer, in various open chat pages, about what content to publish, alter, or censor.

44. RationalWiki's Mission and viewpoint of what constitutes legitimate science are so extremist and dogmatic that, e.g., an article on the website, about the world-renown (and thoroughly mainstream) physicist and popular author Michio Kaku describes Kaku as "a crank" who has "unorthodox views," and compares Kaku to notorious conspiracy theorist David Icke (who has only a high school education and is famous for propounding his belief on social media that world leaders are "lizard people," i.e., shape-shifting reptiles from another dimension.)

45. As another example of RationalWiki's extremist ideology, an article on the website about Steven Pinker (the world-renown linguist, popular author and senior professor of psychology at Harvard University) categorizes Pinker as a "racialism pseudoscientist."

46. No particular background, knowledge, training, or credential—academic, scientific, or otherwise—is required to be an editor, sysop, tech, moderator, or Trustee of RationalWiki. The only requirements to "edit" (i.e., to create or alter content) are to adhere to RationalWiki's

Mission and uphold its point of view, to adhere to various non-ideological behavior rules and procedures for decision-making, and submit to oversight by higher ranking editors.

47. An article created by Toulouse in 2011, titled “Legal FAQ,” has appeared on RationalWiki continuously since that time. It describes RationalWiki as a “content producer.” This article has been edited by Defendants Toulouse and Will.

48. Although there are laudatory articles on RationalWiki, about individuals whose views conform to the RationalWiki point of view, most articles about individuals on RationalWiki are disparaging and accuse the subjects of being anti-science, cranks, fascists, far-right, racist, sexist, and/or pseudoscientists—consistent with RationalWiki’s Mission of “refuting pseudoscience.”

49. Disparaging articles on RationalWiki about individuals, are attack pieces intended to damage the subject’s reputation.

50. When a disparaging article about an individual appears on RationalWiki, this suggests that the person who is the subject of the article is “anti-science,” a “crank,” a “fascist,” “far-right,” a “pseudoscientist,” “racist,” “sexist,” and/or a “white supremacist.”

51. In each and every RationalWiki article about an individual, one or more of those terms is used to describe the subject.

52. The aforesaid terms are not mere subjective epithets but are given specific definitions in separate articles on RationalWiki, which are hyperlinked from other articles the terms appear in, including from disparaging articles about individuals such as the Plaintiff.

II. DEFENDANTS ARE DEFAMING PLAINTIFF

53. Plaintiff James Thompson, Ph.D. (“Dr. Thompson”), is a psychologist and former senior lecturer in psychology at University College London, where he taught for thirty-two years. Dr. Thompson has authored over one-hundred peer-reviewed scholarly papers, many of them in Q1

academic journals¹, and his work has been cited at least 841 times by other researchers. He currently works in the private sector as a consultant and an expert witness.

54. RationalWiki contains an article about Dr. Thompson titled “James Thompson.” The article was first published on RationalWiki in 2018 by Defendant Doe, and has remained published and viewable on the website since that time. It has been edited by multiple RWF Trustees and RationalWiki techs, moderators and sysops, including Defendants Will and Doe.

55. The article is patently an attack piece, that was published to disparage Dr. Thompson and damage his reputation on account of his views.

56. The article portrays Dr. Thompson as a “fascist,” a “pseudoscientist,” and a “white supremacist.”

57. The article is false because Dr. Thompson is none of those things.

58. As used by RationalWiki, those terms are not mere subjective epithets. Rather, RationalWiki publishes specific definitions of what it means by these terms, and hyperlinks those definitions from the article about Dr. Thompson.

a. The Article About Dr. Thompson Uses Narrowly Defined Terminology

59. The first sentence of the RationalWiki article about Dr. Thompson states that, “Dr. James Thompson is a British HBD pseudoscientist who holds sexist and racist opinions.”

60. Each of the underlined words in the above-quoted passage denotes a hyperlink which opens a separate page containing an article on that topic, i.e., on “pseudoscience,” “sexism,” etc. Each of these articles defines what is meant by each term as used on RationalWiki.

¹ Q-score is an index of a scholarly journal’s impact, with Q1 being the top 25% of journals in their domain.

61. The article on “pseudoscience” has been edited within the last three years by numerous RationalWiki sysops, techs, moderators, and Trustees, including Defendants Will and Doe, and defines “pseudoscience” as follows:

Pseudoscience describes any belief system or methodology which tries to gain legitimacy by wearing the trappings of science but fails to abide by the rigorous methodology and standards of evidence that are the marks of true science. Promoters of pseudoscience often adopt scientific vocabulary, describing conjectures as hypotheses, theories, or laws, providing “evidence” from observation and “expert” testimonies, or even developing what appear to be mathematical models of their ideas. However, in pseudoscience, there is no honest attempt to follow the scientific method, provide falsifiable predictions, or develop double-blind experiments. Although pseudoscience is designed to appear scientific, it lacks all of the substance of science.

62. By categorizing Dr. Thompson as a “pseudoscientist” and hyperlinking to the RationalWiki article which gives that definition, Defendants state that Dr. Thompson is a “pseudoscientist” to whom that definition applies.

63. That definition does not apply to Dr. Thompson.

64. Defendants are aware that Dr. Thompson is not a pseudoscientist.

65. The RationalWiki article about him states that, “Thompson has a PhD in Psychology,” and “He was a senior honorary lecturer in psychology at University College London.”

66. The RationalWiki article about Dr. Thompson also cites (at footnote 3) Dr. Thompson’s publicly viewable profile on ResearchGate², which summarizes Dr. Thompson’s credentials at the top of the page and displays an index with links to many of his scientific papers, and shows that these papers have been cited by hundreds of other researchers.

67. Defendants have no basis for calling Dr. Thompson a “pseudoscientist.”

68. Dr. Thompson is a highly credentialled, senior scientist.

² ResearchGate is a professional networking platform for scientists.

69. In contrast, no past or present RationalWiki sysop, tech, moderator or Trustee has any known academic credentials or scientific bona fides, other than Defendant Toulouse (who teaches psychology at a community college) and Will (who purports on LinkedIn to have earned a B.S. in computer science from the University of Maryland).

70. None of the approximately twenty-four individuals who have edited or contributed content to the article about Dr. Thompson have any known academic credentials or scientific bona fides, other than Defendant Will.

71. The RationalWiki article about Dr. Thompson states that,

Thompson erroneously argues because females have on average smaller brains than males, they have lower IQs; on this topic he supports the pseudoscientific research of Richard Lynn.

72. This passage is footnoted with a citation to a blog post by Dr. Thompson in which he discusses the findings of other researchers regarding an array of mean cognitive differences between men and women.

73. In that article, Dr. Thompson does not take a position on the findings he discusses there, and does not “erroneously argue[] because [*sic*] females have on average smaller brains than males, they have lower IQs.”

74. Rather, Dr. Thompson states there that,

Men’s brains are bigger than women’s, even when controlling for bigger body size, which means they should have higher intelligence, though the evidence for that is conflicting.

75. In that article, Dr. Thompson also did not “support[] the pseudoscientific research of Richard Lynn.”

76. Rather, Dr. Thompson states there that,

Most researchers find no notable differences overall, saying that different strengths and weaknesses balance each other out, but Lynn and Irwing (2002, 2004) argued that adult males are almost 4 IQ points brighter than adult females.

77. Dr. Thompson then notes that Lynn and Irwing's position is "the minority position."

78. Richard Lynn's research is not "pseudoscience" as defined by RationalWiki, but applies and adheres to accepted standards and methodologies.

79. In the article about Dr. Thompson, at the bottom of the page, a list of "categories" appears, which Dr. Thompson purportedly belongs in. These categories include: "Fascists" and "Racialism pseudoscientists."

80. Each of the "categories" in this list is hyperlinked to another page on RationalWiki which lists individuals who purportedly belong in that category, including Dr. Thompson.

81. At the top of the "Categories:Fascists" page (which has been edited within the last three years by Defendants Will and Doe, and where Dr. Thompson is listed alongside "Idi Amin," "Saddam Hussein," and "Adolf Hitler"), a conspicuous, highlighted note appears in bold font, which reads, "*See the main article for this category, Fascism.*" The underlined word denotes a hyperlink which links to an article titled "Fascism." That article has been edited within the last three years by Defendants Will and Doe, and defines "fascism," as,

a system of far-right authoritarianism and totalitarianism characterized by its obsession with the nation and often race, severe regimentation of society, and extreme levels of political violence aimed at purifying and expanding the state.

82. The underlined terms denote hyperlinks to other articles that further define those terms. By categorizing Dr. Thompson as a "fascist," Defendants state that Dr. Thompson supports fascism as so defined.

83. Dr. Thompson is not a fascist and has never supported any system that fits that definition.

84. Defendants have no reason to believe, and the RationalWiki article cites no source to suggest, that Dr. Thompson is a fascist or supporter of fascism as so defined, or any system that fits that definition.

85. The RationalWiki article about Dr. Thompson states that,

In 2015-2016 Thompson hosted the London Conference on Intelligence, that attracted neo-Nazis, white supremacists, [and] Holocaust deniers.

86. This statement is false: the 2015-16 London Conference on Intelligence did not attract any “neo-Nazis, white supremacists, [or] Holocaust deniers.”

87. Each of the underlined terms in the above-quoted passage denotes a hyperlink which opens a separate page containing an article on that topic that defines what is meant by that term.

88. The article titled “Neo-Nazism” defines that term as, “a modern movement which seeks to preserve and implement the failed goals and ideals of the Nazis.”

89. The article titled “White supremacy” defines that term as, “an ideology claiming that white people are superior to other races, and are a ‘master race’...”

90. The article titled “Holocaust denial” defines that term as, “the assertion that the Holocaust... never happened or happened vastly differently from the ‘official’ story...”

91. By categorizing Dr. Thompson (alongside Hitler) as a “fascist” and stating that he hosted a conference “that attracted neo-Nazis, white supremacists, [and] Holocaust deniers,” the RationalWiki article about Dr. Thompson strongly implies that Dr. Thompson himself approves of neo-Nazism, white supremacy, and Holocaust denial.

92. Dr. Thompson does not approve of any of those things, and Defendants have no basis, and provide no basis, for making that implication about him.

93. The RationalWiki article about Dr. Thompson further states that, “Thompson has not mentioned any of his extreme views on race and sex in mainstream interviews...”

94. This implies that Dr. Thompson is deceptive about his views or improperly conceals them, when interacting with journalists.

95. That implication is false.

96. Dr. Thompson has given at least 550 television interviews about clinical psychology matters. In none of those interviews were Dr. Thompson's views on "race and sex" ever sought.

97. At the top righthand side of the article about Dr. Thompson, immediately beneath a headshot of Dr. Thompson, a red box appears prominently, with text which reads, "Frogs, clowns, and swastikas: Alt-right," thus stating that Dr. Thompson is "Alt-right."

98. The term "Alt-right" in that text is hyperlinked to a RationalWiki article of the same title, where "alt-right" is defined as "a euphemism for Nazism," "the merger of traditional white nationalists [and] neo-Nazis" and "a hip alias for white supremacists." A graphic appears at the top righthand side of the "Alt-right" article with text that reads, "A person is said to be alternative right if they are a NAZI PIECE OF [EXPLETIVE]."

99. The underlined terms in the above-quoted passages denote hyperlinks to further RationalWiki articles which specifically define each term.³

100. By labeling Dr. Thompson as "alt-right," RationalWiki is stating that these definitions apply to Dr. Thompson.

101. Those definitions do not apply to Dr. Thompson, who is not a "white nationalist," a "Nazi," or a "neo-Nazi," by any definition, including as defined by RationalWiki.

102. Dr. Thompson has never espoused white nationalism, Nazism, or neo-Nazism, by any definition, including as defined by RationalWiki.

³ The article titled "White nationalism" states that "[White nationalists] seek to ensure the survival of (what they see as) the white race and its putative culture, usually in opposition to a supposed globalist threat or Zionist conspiracy... [and] take the side of Nazi Germany... in discussions of WWII."

103. Defendants have no basis for calling Dr. Thompson “alt-right” by the definition and descriptions RationalWiki gives that term.

104. At the bottom of the page on the RationalWiki article about Dr. Thompson, the list of categories that Dr. Thompson purportedly belongs in includes “alt-right,” with a hyperlink to a page titled “Categories:Alt-right,” where Dr. Thompson is listed alongside the Ku Klux Klan.

105. By categorizing Dr. Thompson as “alt-right,” RationalWiki is stating that its definition of that term applies to Dr. Thompson.

106. RationalWiki’s definition of that term does not apply to Dr. Thompson, and Defendants have no basis for stating that it does.

III. PLAINTIFF IS BEING DAMAGED

107. The “James Thompson” article was published on RationalWiki, by Defendant Doe, in May 2018, and has remained published and viewable on the website since that time.

108. Since 2018, the article has ranked on the first page of Google search results for various combinations of search terms containing Dr. Thompson’s name, including “James Thompson psychologist” and “James Thompson UCL” (i.e., University College London).

109. Defendants are aware that RationalWiki’s “page rank” on Google is abnormally high, and that, as a result, when they publish disparaging articles like the one about Dr. Thompson, this is likely to cause considerable reputational damage to the subjects and targets of that content, and is likely to discourage third parties from dealing with the individual subjects targeted.

110. In an article on RationalWiki titled, “Wiki,” in a passage that has been edited by an RWF Trustee within the last three months, that article states, “RationalWiki does have a few articles that appear in the top of Google's search rankings.”

111. Another article on RationalWiki titled, “RationalWiki,” states that,

RW is a fairly popular site... [S]ince 2013, RW's Alexa rank has hovered between 15,000th and 25,000th most popular website on the entire Internet, which translates to *about* 4 million-ish unique monthly visitors.... Since RationalWiki's inception, we've been featured in articles, op-ed pieces, and news reports — either quoted verbatim or referenced outright as a source for the article's claims — by a slew of online and mainstream media outlets worldwide.

112. Due to RationalWiki's claims of scientific objectivity, its resemblance to Wikipedia, its high rank in Google search results, and its use of footnotes and hyperlinks (however dubious upon concerted examination), the website appears authoritative, thus discouraging others from dealing with the targets of its disparaging articles.

113. Defendants are well aware of this, as the prominent fundraiser banner at the top of each page of RationalWiki states that RationalWiki's purpose is to engage in “document[ing] pseudoscience” and “defending truth and objectivity.”

114. Because the RationalWiki article about him ranks on the first page of Google search results for his name, Dr. Thompson's colleagues and potential business partners see the article when they search for him on Google.

115. Before the RationalWiki article about him appeared in 2018, Dr. Thompson was frequently approached by journalists, to give paid interviews on television and radio, worth several hundred GBP (i.e., British pounds sterling) apiece.

116. These television and radio appearances would result in outreach from business clients seeking paid consulting services, which Dr. Thompson would provide, and be remunerated for, up to £30,000 per contract.

117. These appearances would also result in invitations to give paid talks before professional bodies, remunerated at a rate of several hundred pounds per talk, plus paid travel expenses.

118. These talks would raise Dr. Thompson's public profile and result in further consulting opportunities.

119. Since the appearance of the RationalWiki article about him in 2018, Dr. Thompson has not had any such television, radio, consulting or speaking opportunity, because people searching for him on the internet to make contact encounter the article, then refrain from dealing with him.

120. These damages are ongoing.

121. As a result of the RationalWiki article about him and its prominent appearance in Google search results, Dr. Thompson has lost relationships with friends.

122. As a result of the RationalWiki article about him and its prominent appearance in Google search results, Dr. Thompson has lost professional relationships, including mutual referral networks which once led to remunerated consulting work.

123. The loss of business opportunities, friendships, and professional relationships has had, and continues to have, a tremendous negative impact on Dr. Thompson's self-worth and emotional wellbeing.

124. The aggregate value of lost business opportunities caused by Defendants over the past seven years is at least \$400,000. Over the past three years, it is at least \$170,000.

125. To have an article appear prominently in Google search results for a person's name, which falsely portrays that person as a fascist, a neo-Nazi, and a pseudoscientist—alongside highly particularized and deeply stigmatizing definitions of those terms—is inherently damaging, humiliating, and stressful.

126. The "James Thompson" article has caused and continues to cause potential business associates to refrain from dealing with Dr. Thompson, resulting in ongoing financial damages.

127. The "James Thompson" article has caused Dr. Thompson humiliation, stress, mental anguish, and suffering.

ENUMERATED CAUSES OF ACTION

WHEREFORE the Plaintiff, JAMES THOMPSON, Ph.D., as a direct and proximate result of Defendants' misconduct, has been damaged, and hereby pleads the following causes of action against Defendants, whom he seeks to hold liable:

COUNT I
Defamation
Against All Defendants

128. Plaintiff incorporates by reference all preceding paragraphs.

129. Defendants published false statements of fact about Plaintiff to third parties.

130. Defendants published aforesaid false statements without privilege.

131. Aforesaid third parties understood the false statements to have defamatory meaning.

132. Defendants published the false statements while knowing they are false.

133. Defendants published the false statements with reckless disregard for the truth.

134. Defendants published the false statements negligently.

135. As a direct and proximate result of Defendants' defamation, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney's fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT II
Invasion of Privacy: False Light
Against All Defendants

136. Plaintiff incorporates by reference all preceding paragraphs.

137. Defendants published false statements of fact about Plaintiff in public fora, attributing false characteristics to Plaintiff.

138. The characteristics which Defendants falsely attributed to Plaintiff are highly offensive to a reasonable person.

139. Defendants intentionally portrayed Plaintiff in a false light before the community.

140. Defendants recklessly portrayed Plaintiff in a false light before the community.

141. Defendants portrayed Plaintiff in a false light without privilege.

142. Defendants' false light invasion of privacy is wanton and willful.

143. As a result of Defendants' false light invasion of privacy, Plaintiff has suffered humiliation, mental anguish, and suffering.

144. As a direct and proximate result of Defendants' false light invasion of privacy, the Plaintiff has been damaged, and is entitled to compensatory damages, punitive damages, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT III
Conspiracy
Against All Defendants

145. Plaintiff incorporates by reference all preceding paragraphs.

146. Defendants intentionally agreed to defame Plaintiff and violate Plaintiff's privacy.

147. Defendants agreed to defame Plaintiff and violate Plaintiff's privacy with knowledge of unlawfulness.

148. One or more Defendants acted overtly in furtherance of aforesaid agreement to defame.

149. One or more Defendants acted overtly in furtherance of aforesaid agreement to invade privacy.

150. Defendants participated in the maintenance of a webpage dedicated to defaming Plaintiff, by publishing, editing, and monitoring content on the webpage.

151. As a direct and proximate result of Defendants' conspiracy, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney's fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT IV
Prima Facie Tort
Against All Defendants

152. Plaintiff incorporates by reference all preceding paragraphs.

153. Defendants jointly and severally committed intentional acts directed at Plaintiff.

154. Defendants committed aforesaid acts with intent to injure the Plaintiff.

155. Defendants committed aforesaid acts without justification.

156. Aforesaid acts were wanton and willful.

157. Aforesaid intentional acts were otherwise lawful.

158. Plaintiff was damaged as a result of aforesaid acts.

159. As a direct and proximate result of Defendants' prima facie tort, the Plaintiff has been damaged and is entitled to compensatory damages, punitive damages, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable

JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable.

PRAYER FOR RELIEF

WHEREFORE the Plaintiff, JAMES THOMPSON, Ph.D., hereby respectfully prays the Court's relief, as follows:

- I. Compensatory damages in the amount to be proven at trial.
- II. Punitive damages.
- III. Pre- and post-judgment interest.
- IV. Attorney's fees and all costs of bringing this action.
- V. Such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

LATE NIGHT LAW, LLC

By: 

Aaron T. Cress, Esq.
12231 Academy Rd NE 301-274
Albuquerque, NM 87111
aaron@latenightlaw.com
(505) 225-2623

Attorney for James Thompson